

**REMARKS/ARGUMENTS**

This Amendment is responsive to the Office Action mailed on April 15, 2005. A petition for a 1-month extension of time is attached so that the due date is to and including August 15, 2005.

In this Amendment, claims 1-20 are canceled, and claims 21-35 are added so that claims 21-35 are pending and subject to examination on the merits. Entry of this Amendment is requested.

At page 2 of the Office Action, the Examiner states that claims 10-20 are directed to a separate invention. Applicants do not agree with the restriction requirement. However, claims 10-20 are canceled to expedite the prosecution. Applicants reserve the right to file a divisional application including the canceled claims.

Claims 1-5 are rejected as being anticipated by Kauser et al. (U.S. Patent No. 5,724,660). Claims 6-8 are rejected as being obvious over Kauser et al. and Eizenhoefer. Claim 9 is rejected as being obvious over Kauser et al. and Eizenhoefer, and Singer et al. These rejections are moot in view of newly submitted claims 21-35. As explained in detail below, claims 21-35 are patentable over Kauser et al. and the other prior art of record.

Kauser et al.'s abstract discloses a method and apparatus for determining the location of a mobile telephone within the serving area of a mobile telephone system. A mobile switching center analyzes the calling mobile telephone number and the called telephone number to determine if a location function is required. Signals strengths are received by the mobile telephone from cell antennas within a serving area. In addition, the mobile telephone comprises a GPS receiver/processor for sending the most recent GPS coordinates of the mobile telephone which are within a predetermined confidence level. The GPS coordinates are compared to the calculated location area to increase the accuracy of the location determination.

### **Claims 21-27**

Kauser et al. also fails to teach or suggest a method comprising, *inter alia*, "converting at least one of the first uncertainty information or the second uncertainty information into a standard format; and using the first uncertainty information and the second uncertainty information in the standard format to determine a location of a wireless station" as recited in independent claim 21. As explained at pages 11-12 of the present application, it is useful to express location information including uncertainty information in a standard format so that the uncertainty information can be compared. For example, Figures 3a-3e in the present application show standardized circles of uncertainty regions that circumscribe actual uncertainty regions associated with different location finding technologies. Such standardized uncertainty regions can be used, for example, to calculate a reduced uncertainty region for a location determination using two different pieces of location information from different pieces of location finding equipment (see p. 13, l. 20-23). While Kauser et al. describes using GPS coordinates that are within a "predetermined confidence level", Kauser et al. fails to teach or suggest the use or manipulation of at least two pieces of uncertainty information, let alone the conversion of at least one of a first uncertainty information and a second uncertainty information into a standard format. Accordingly, Kauser et al. fails to teach or suggest the invention of claim 21 (and dependents thereon).

### **Claims 28-35**

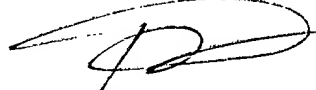
Kauser et al. fails to teach or suggest a method comprising, *inter alia*, establishing an interface, "wherein the interface is capable of receiving a plurality of location requests from different applications in a plurality of different formats and is capable of converting the plurality of location requests into the standard" as recited in independent claim 28. This feature is further described at the carryover paragraph between pages 17-18 of the specification and is shown in FIG. 2. As shown in FIG. 2, different applications 226, 228, 230 may submit requests to a wireless location interface 224 so that standard location requests are submitted to a location

manager 214. The only place that Kauser et al. appears to specifically discuss a location request is at col. 5, lines 43-50 (e.g., "the MSC 220 can initiate the location function and the location of the mobile telephone could be communicated to the mobile telephone user"). It is apparent from this passage, however, that there is a single location request in a single format, and Kauser et al. therefore fails to teach or suggest an interface that is capable of receiving a plurality of location requests from different applications in a plurality of different formats and that is capable of converting the plurality of location requests into a standard as recited in claim 28. Accordingly, Kauser et al., alone or in combination with other prior art references, fails to teach or suggest the invention of claim 28, and any claims depending therefrom.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,



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